
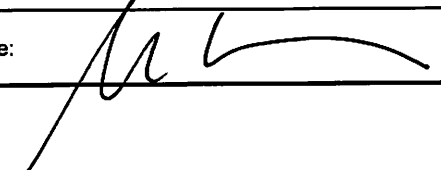


EXHIBIT A

	<h2 style="margin: 0;">Civil Case Information Statement</h2> <h3 style="margin: 0;">(CIS)</h3> <p style="margin: 5px 0;">Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed</p>		For Use by Clerk's Office Only Payment type: <input type="checkbox"/> ck <input type="checkbox"/> cg <input type="checkbox"/> ca Chg/Ck Number: _____ Amount: _____ Overpayment: _____ Batch Number: _____	
	Attorney/Pro Se Name Marc A. Weinberg, Esq.		Telephone Number 215-576-0100	
	Firm Name (if applicable) Saffren & Weinberg		County of Venue Camden	
	Office Address 815 Greenwood Ave., Ste. 22 Jenkintown, PA 19046		Docket Number (when available)	
	Document Type Complaint		Jury Demand <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Name of Party (e.g., John Doe, Plaintiff) Monica Ballinger, Plaintiff		Caption Monica Ballinger v. Sequel Youth and Family Services d/b/a Capital Academy, Sequel Youth & Family Services, LLC, JOhn Does I though X and ABC Companies I though X		
Case Type Number (See reverse side for listing) 509	Are sexual abuse claims alleged? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is this a professional malpractice case? <input type="checkbox"/> Yes <input type="checkbox"/> No If you have checked "Yes," see <i>N.J.S.A. 2A:53A-27</i> and applicable case law regarding your obligation to file an affidavit of merit.		
Related Cases Pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If "Yes," list docket numbers		
Do you anticipate adding any parties (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Name of defendant's primary insurance company (if known) <input type="checkbox"/> None <input checked="" type="checkbox"/> Unknown		
The Information Provided on This Form Cannot be Introduced into Evidence.				
Case Characteristics for Purposes of Determining if Case is Appropriate for Mediation				
Do parties have a current, past or recurrent relationship? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		If "Yes," is that relationship: <input checked="" type="checkbox"/> Employer/Employee <input type="checkbox"/> Friend/Neighbor <input type="checkbox"/> Other (explain) <input type="checkbox"/> Familial <input type="checkbox"/> Business		
Does the statute governing this case provide for payment of fees by the losing party? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition				
Do you or your client need any disability accommodations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, please identify the requested accommodation:		
Will an interpreter be needed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, for what language?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .				
Attorney Signature: 				

Side 2



Civil Case Information Statement (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days discovery

- | | |
|--|---|
| 151 Name Change | 506 PIP Coverage |
| 175 Forfeiture | 510 UM or UIM Claim (coverage issues only) |
| 302 Tenancy | 511 Action on Negotiable Instrument |
| 399 Real Property (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction) | 512 Lemon Law |
| 502 Book Account (debt collection matters only) | 801 Summary Action |
| 505 Other Insurance Claim (including declaratory judgment actions) | 802 Open Public Records Act (summary action) |
| | 999 Other (briefly describe nature of action) |

Track II - 300 days discovery

- | | |
|---|---|
| 305 Construction | 603Y Auto Negligence – Personal Injury (verbal threshold) |
| 509 Employment (other than Conscientious Employees Protection Act (CEPA) or Law Against Discrimination (LAD)) | 605 Personal Injury |
| 599 Contract/Commercial Transaction | 610 Auto Negligence – Property Damage |
| 603N Auto Negligence – Personal Injury (non-verbal threshold) | 621 UM or UIM Claim (includes bodily injury) |
| | 699 Tort – Other |

Track III - 450 days discovery

- | | |
|------------------------------|--|
| 005 Civil Rights | 608 Toxic Tort |
| 301 Condemnation | 609 Defamation |
| 602 Assault and Battery | 616 Whistleblower / Conscientious Employee Protection Act (CEPA) Cases |
| 604 Medical Malpractice | 617 Inverse Condemnation |
| 606 Product Liability | 618 Law Against Discrimination (LAD) Cases |
| 607 Professional Malpractice | |

Track IV - Active Case Management by Individual Judge / 450 days discovery

- | | |
|---|--|
| 156 Environmental/Environmental Coverage Litigation | 514 Insurance Fraud |
| 303 Mt. Laurel | 620 False Claims Act |
| 508 Complex Commercial | 701 Actions in Lieu of Prerogative Writs |
| 513 Complex Construction | |

Multicounty Litigation (Track IV)

- | | |
|---|--|
| 271 Accutane/Isotretinoin | 601 Asbestos |
| 274 Risperdal/Seroquel/Zyprexa | 623 Propecia |
| 281 Bristol-Myers Squibb Environmental | 624 Stryker LFIT CoCr V40 Femoral Heads |
| 282 Fosamax | 625 Firefighter Hearing Loss Litigation |
| 285 Stryker Trident Hip Implants | 626 Abilify |
| 286 Levaquin | 627 Physiomesher Flexible Composite Mesh |
| 289 Reglan | 628 Taxotere/Docetaxel |
| 291 Pelvic Mesh/Gynecare | 629 Zostavax |
| 292 Pelvic Mesh/Bard | 630 Proceed Mesh/Patch |
| 293 DePuy ASR Hip Implant Litigation | 631 Proton-Pump Inhibitors |
| 295 AlloDerm Regenerative Tissue Matrix | 632 HealthPlus Surgery Center |
| 296 Stryker Rejuvenate/ABG II Modular Hip Stem Components | 633 Prolene Hernia System Mesh |
| 297 Mirena Contraceptive Device | |
| 299 Olmesartan Medoxomil Medications/Benicar | |
| 300 Talc-Based Body Powders | |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59 ☐ Consumer Fraud

SAFFREN & WEINBERG
By: MARC A. WEINBERG, ESQUIRE
Attorney I.D.: 039291990
815 Greenwood Avenue, Suite 22
Jenkintown, PA 19046
(215) 576-0100

Attorney for Plaintiff

MONICA BALLINGER
45 Pondview Lane
Sicklerville, NJ 08081

SUPERIOR COURT OF NEW JERSEY
CAMDEN COUNTY – LAW DIVISION
CIVIL PART

vs.

DOCKET No.

SEQUEL YOUTH AND
FAMILY SERVICES d/b/a
CAPITAL ACADEMY
1770 Mt. Ephraim Avenue
Camden, NJ 08104

CIVIL ACTION - COMPLAINT,
JURY DEMAND, CERTIFICATION,
AND DESIGNATION OF TRIAL
COUNSEL

and

SEQUEL YOUTH AND
FAMILY SERVICES, LLC
1131 Eagletree Lane SE
Huntsville, AL 35801

and

JOHN DOES I THROUGH X,
fictitious names

and

ABC COMPANIES I THROUGH X,
fictitious names

1. Plaintiff, Monica Ballinger, is an adult individual who currently resides at the above-captioned address.

2. Defendant, Sequel Youth & Family Services d/b/a Capital Academy, is believed to be a foreign corporation with a place of business and address for service at 1770 Mt. Ephraim Ave., Camden, NJ 08104.

3. Defendant, Sequel Youth & Family Services, LLC is believed to be a foreign corporation with a place of business and address for service at 1131 Eagletree Lane SE, Huntsville, AL 35801.

4. Defendants, John Does I through X, are fictitious names for one or more individuals whose full and complete identities are currently unknown and who on January 23, 2020, and for a period of time prior thereto, were employed by Defendants, Sequel Youth & Family Services d/b/a Capital Academy and Sequel Youth & Family Services, or by one or more of the Defendants, ABC Companies I through X, at the academy located at 1170 Mt. Ephraim Ave., Camden, NJ 08104.

5. Defendants, ABC Companies I through X, are fictitious names for one or more corporations, general partnerships, limited partnerships, companies, limited liability companies or other entities whose full and complete identities are currently unknown and who on January 23, 2020, and at all other times material hereto, owned, possessed and/or controlled the academy located 1770 Mt. Ephraim Ave., Camden, NJ 08104.

6. At all times relevant hereto, Plaintiff was supervised by Defendants' employees, Executive Director Don Christano and P.M. Supervisor, Eugene Lett.

7. At all times relevant hereto, Beverly Turner functioned as Plaintiff's Human Resources representative.

8. Plaintiff was hired by the Defendants, in or around May, 2011, and worked as the Food Services Manager for the Capital Academy, located at 1770 Mt. Ephraim Ave., Camden, NJ 08104.

9. On or about December 4, 2019, Plaintiff's private information relating to a consensual relationship, was nefariously obtained by Defendant's employee, Eugene Lett, who proceeded to tell Plaintiff she was to pay him \$5,000.00 in exchange for Lett keeping the Plaintiff's personal information confidential.

10. Plaintiff attempted to avoid Lett, who repeatedly harassed the Plaintiff.

11. On December 22, 2019, Lett demanded the \$5,000.00 from the Plaintiff that day.

12. On or about December 23, 2019, Plaintiff reported the harassment, and Lett's demand for payments to Beverly Turner, Defendants' Human Resources representative

13. Plaintiff spoke with Turner about the situation between eight and ten times, yet, Turner took no action.

14. Also on December 23, 2019, Plaintiff was contacted by Don Christiano, who asked Plaintiff if she had "got with" Lett, regarding the money. Plaintiff said she had not.

15. Don Christiano then threatened Plaintiff's employment.

16. On January 23, 2020, Plaintiff was accused of sending personal photos to Lett, which she had not done.

17. Plaintiff was terminated by Defendants on January 23, 2020.

18. As the result of the events described herein the Plaintiff has suffered and may continue to suffer from extreme mental anguish, emotional upset, psychological injury and other noneconomic losses.

19. As a further result of the events described herein, the Plaintiff has suffered and may continue to suffer from embarrassment, humiliation and degradation.

20. As a further result of the events described herein, the Plaintiff has suffered and may continue to suffer from embarrassment, humiliation and degradation.

21. As a further result of the events described herein, the Plaintiff has suffered and may continue to suffer from fear, frustration and anxiety.

22. As a further result of the events described herein, the Plaintiff has been required to seek out and obtain medical, psychological and/or psychiatric attention and care, and has incurred bills or has become obligated to pay for such medical, psychological and/or psychiatric attention and care, and in the future may be required to seek out and obtain additional medical, psychological and/or psychiatric attention and care, and incurred bills or become obligated to pay for such medical, psychological and/or psychiatric attention and care.

COUNT I:

**MARIE BALLINGER VS. SEQUEL YOUTH & FAMILY SERVICES D/B/A CAPITAL
ACADEMY AND SEQUEL YOUTH & FAMILY SERVICES, LLC
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

23. Plaintiff hereby incorporates the averments of paragraphs 1 through 14 of this complaint as though set forth herein at length.

24. In allowing their employees to harass the Plaintiff, the Defendants, acted intentionally to inflict emotional distress upon Plaintiff causing Plaintiff to sustain the damages previously described.

25. In allowing their employees to harass the Plaintiff, the Defendants, acted with reckless disregard for the high probability or likelihood that her conduct would cause Plaintiff to suffer emotional distress and sustain the damages previously described.

WHEREFORE, Plaintiff, Marie Ballinger, demands judgment in his favor and against Defendants, for intentional infliction of emotional distress, in an amount sufficient to compensate her for her injuries and damages together with an award of punitive damages, interest, costs, counsel fees, and such further relief as this Court deems just and appropriate.

COUNT II:
MARIE BALLINGER VS. SEQUEL YOUTH & FAMILY SERVICES D/B/A CAPITAL
ACADEMY AND SEQUEL YOUTH & FAMILY SERVICES, LLC
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS

26. Plaintiff hereby incorporates all preceding averments of this complaint as though set forth herein at length.

27. In allowing their employees to harass Plaintiff, the Defendants, acted negligently and carelessly to inflict emotional distress upon Plaintiff causing Plaintiff to sustain the damages previously described.

WHEREFORE, Plaintiff, Marie Ballinger, demands judgment in his favor and against Defendants, for negligent infliction of emotional distress, in an amount sufficient to compensate her for her injuries and damages together with interest, costs, counsel fees, and such further relief as this Court deems just and appropriate.

COUNT III:
MICHAEL KILLMARTIN VS. JOHN DOES I THROUGH X
INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

28. Plaintiff hereby incorporates Plaintiff hereby incorporates all preceding averments of this complaint as though set forth herein at length.

29. In harassing the Plaintiff, the Defendants, John Does I through X, acted intentionally to inflict emotional distress upon Plaintiff causing Plaintiff to sustain the damages previously described.

30. In harassing Plaintiff, the Defendants, John Does I through X, acted with reckless disregard for the high probability or likelihood that their conduct would cause Plaintiff to suffer emotional distress and sustain the damages previously described.

WHEREFORE, Plaintiff, Marie Ballinger, demands judgment in his favor and against Defendants, John Does I through X, for intentional infliction of emotional distress, in an amount sufficient to compensate him for his injuries and damages together with an award of punitive damages, interest, costs, counsel fees, and such further relief as this Court deems just and appropriate.

COUNT IV:
MARIE BALLINGER VS. JOHN DOES I THROUGH X
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS

31. Plaintiff hereby incorporates all preceding averments of this complaint as though set forth herein at length.

32. In harassing the Plaintiff, the Defendants, John Does I through X, acted negligently and carelessly to inflict emotional distress upon Plaintiff causing Plaintiff to sustain the damages previously described.

WHEREFORE, Plaintiff, Marie Ballinger, demands judgment in his favor and against Defendants, John Does I through X, for negligent infliction of emotional distress, in an amount sufficient to compensate him for his injuries and damages together with interest, costs, counsel fees and such further relief as this Court deems just and appropriate.

COUNT V:
MARIE BALLINGER VS. SEQUEL YOUTH & FAMILY SERVICES D/B/A CAPITAL
ACADEMY AND SEQUEL YOUTH & FAMILY SERVICES, LLC
NELGIGENCE

33. Plaintiff hereby incorporates all preceding averments of this complaint as though set forth herein at length.

34. The injuries and damages sustained by Plaintiff were the direct and proximate result of the negligence and carelessness of Defendants, Sequel Youth & Family Service d/b/a Capital Academy and Sequel Youth & Family Services, LLC.

35. The negligence and carelessness of Defendants, Sequel Youth & Family Service d/b/a Capital Academy and Sequel Youth & Family Services, LLC. consisted of the following:

- a) Failing to properly supervise, manage, monitor or oversee Don Christiano, Beverly Turner and Eugene Lett, or the Defendants, John Does I through X;
- b) Negligently hiring or retaining Don Christiano, Beverly Turner and Eugene Lett, or the Defendants, John Does I through X;
- c) Firing the Plaintiff without just cause;
- d) Such further negligence and carelessness as the circumstances and discovery shall disclose.

36. Defendants, Sequel Youth & Family Service d/b/a Capital Academy and Sequel Youth & Family Services, LLC. are directly liable to Plaintiff for his injuries and damages or is vicariously liable pursuant to the doctrine of respondeat superior.

WHEREFORE, Plaintiff, Marie Ballinger, demands judgment in her favor and against Defendants, Defendants, Sequel Youth & Family Service d/b/a Capital Academy and Sequel Youth & Family Services, LLC. in an amount sufficient to compensate her for her injuries and damages together with interest, costs, counsel fees and such further relief as this Court deems just and appropriate.

COUNT VI:
MARIE BALLINGER VS. ABC COMPANIES I THROUGH X
NEGLIGENCE

37. Plaintiff hereby incorporates all preceding averments of this complaint as though set forth herein at length.

38. The injuries and damages sustained by Plaintiff were the direct and proximate result of the negligence and carelessness of Defendant, ABC Companies I through X.

39. The negligence and carelessness of Defendant, ABC Companies I through X, consisted of the following:

- a) Failing to properly supervise, manage, monitor or oversee Don Christiano, Beverly Turner and Eugene Lett, or the Defendants, John Does I through X;
- b) Negligently hiring or retaining Don Christiano, Beverly Turner and Eugene Lett, or the Defendants, John Does I through X;
- c) Firing the Plaintiff without just cause;
- d) Such further negligence and carelessness as the circumstances and discovery shall disclose.

35. Defendant, ABC Companies I through X, is directly liable to Plaintiff for his injuries and damages or is vicariously liable pursuant to the doctrine of respondeat superior.

WHEREFORE, Plaintiff, Marie Ballinger, demands judgment in his favor and against Defendants, Davita, Inc., in an amount sufficient to compensate her for her injuries and damages together with interest, costs, counsel fees and such further relief as this Court deems just and appropriate.

SAFFREN & WEINBERG

BY: MARC A. WEINBERG, ESQUIRE
Attorney for Plaintiff

JURY DEMAND

Plaintiff, Marie Ballinger, hereby demands a trial by jury.

SAFFREN & WEINBERG

BY: _____
MARC A. WEINBERG, ESQUIRE

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Marc A. Weinberg, Esquire, is hereby designated as trial counsel in the above matter.

SAFFREN & WEINBERG

BY: _____
MARC A. WEINBERG, ESQUIRE

CERTIFICATION PURSUANT TO RULE 4:5-1

I certify pursuant to Rule 4:5-1 that I know of no other proceedings pending or that are contemplated in any Court or Arbitration proceeding that concerns this subject matter and know of no other parties that need to be joined in this action.

SAFFREN & WEINBERG

DATED: _____

BY: _____
MARC A. WEINBERG, ESQUIRE

CAMDEN COUNTY
SUPERIOR COURT
HALL OF JUSTICE
CAMDEN NJ 08103

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (856) 650-9100
COURT HOURS 8:30 AM - 4:30 PM

DATE: AUGUST 21, 2020
RE: BALLINGER MONICA VS SEQUEL YOUTH & FAMIL Y SERVI
DOCKET: CAM L -002825 20

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON STEVEN J. POLANSKY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 101
AT: (856) 650-9100 EXT 43126.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: MARC A. WEINBERG
SAFFREN & WEINBERG
815 GREENWOOD AVENUE
SUITE 22
JENKINTOWN PA 19046

ECOURTS

MONICA BALLINGER

Plaintiff

20200824121043

Superior Court Of New Jersey

vs

CAMDEN Venue

SEQUEL YOUTH AND FAMILY SERVICES D/B/A CAPITAL ACADEMY, ET AL

Defendant

Docket Number: CAM L 2825 20

Person to be served (Name and Address):SEQUEL YOUTH AND FAMILY SERVICES D/B/A CAPITAL ACADEMY
1770 MT. EPHRAIM AVENUE
CAMDEN NJ 08103

By serving: SEQUEL YOUTH AND FAMILY SERVICES D/B/A CAPITAL ACADEMY

AFFIDAVIT OF SERVICE

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ _____

Attorney: MARC A. WEINBERG, ESQ.

Papers Served: SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT
NOTICE, CERTIFICATIONService Data: ☒ Served Successfully ☐ Not Served

Name of Person Served and relationship/title:

Date/Time: 8/28/2020 10:48 AM

BEVERLY TURNER

☐ Delivered a copy to him/her personally

PERSON AUTHORIZED TO ACCEPT SERVICE

☐ Left a copy with a competent household member over 14 years of age
residing therein (indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent,
registered agent, etc. (indicate name & official title at right)**Description of Person Accepting Service:**

SEX: F AGE: 36-50 HEIGHT: 5'4"-5'8" WEIGHT: 131-160 LBS. SKIN: BLACK HAIR: BLACK OTHER: _____

Unserved:

- ☐ Defendant is unknown at the address furnished by the attorney
- ☐ All reasonable inquiries suggest defendant moved to an undetermined address
- ☐ No such street in municipality
- ☐ Defendant is evading service
- ☐ Appears vacant
- ☐ No response on:

Date/Time: _____

Date/Time: _____

Date/Time: _____

Other: _____

Served Data:

Subscribed and Sworn to me this

31 day of Aug, 2020

Notary Signature:

ROSEMARY RAMOS
NOTARY PUBLIC
NEW JERSEYName of Notary
Commission Expires Sept. 23, 2024

I, HANAN HAYON,

was at the time of service a competent adult, over the age
of 18 and not having direct interest in the litigation. I declare
under penalty of perjury that the foregoing is true and
correct.

Signature of Process Server

8/31/2020
Date

Name of Private Server: HANAN HAYON Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MONICA BALLINGER,	:	
	:	
	:	Civil Action No. _____
Plaintiff,	:	
	:	
v.	:	Civil Action
	:	
SEQUEL YOUTH AND FAMILY	:	
SERVICES d/b/a CAPITAL	:	
ACADEMY;	:	
SEQUEL YOUTH AND FAMILY	:	
SERVICES, LLC,	:	
JOHN DOES I-X AND ABC	:	
COMPANIES I-X	:	
	:	
Defendants.		

DECLARATION OF MEGAN STUPAK, ESQ.

I, Megan Stupak, declare as follows:

1. I am Corporate Counsel for Defendant Sequel Youth and Family Services, LLC (“Sequel”).
2. I have personal knowledge of and am competent to testify as to the matters set forth herein.
3. Sequel is a limited liability company organized under the laws of the State of Delaware.
4. Sequel’s members are located in the states of Arizona, Delaware, Florida, Iowa, Idaho, Illinois, Indiana, Maine, Michigan, North Carolina, New York, Ohio, South Dakota, and Utah, respectively.
5. On August 25, 2020, Sequel was served with the Complaint filed by Plaintiff in the above-captioned matter.
6. Sequel of New Jersey, Inc. d/b/a Capital Academy is a Delaware corporation with its corporate headquarters located at 1131 Eagletree Lane, Huntsville, Alabama, 35801.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 23, 2020

Megan Stupak
Megan Stupak, Esq.

44291003.1